<u>REMARKS</u>

Claims 1-32 are pending in the application. The Examiner has rejected all of the claims. Claims 16 and 23 have been amended. Support for the amendments to these claims is found in the specification, drawings and claims as filed. No new matter has been introduced.

The Examiner objected to the Specification because it contains blank attorney docket references to a co-pending related case on page 1 ¶ 1 and page 15 ¶ 3. Applicants have amended page 1 ¶ 1 to include the appropriate serial number, filing date and title, and page 15 ¶ 3 to include the appropriate serial number. Accordingly, Applicants respectfully request withdrawal of the objection to the Specification.

Claims 1-27 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2003/0023333 ("Birkle et al."). The Examiner asserts that Birkle et al. (page 1 ¶ 0006, page 2 ¶¶ 0021-0022, 0025 and Fig. 3 element 10) disclose the invention as claimed in independent claim 1. Independent claim 1 claims "[a]n equipment area network (EAN)...comprising: a plurality of local controllers each being dedicated and connected to an individual one of said...pieces of equipment, respectively; a plurality of local Web servers each being dedicated and connected to an individual one of said...controllers, respectively; and local isolation means for selectively isolating said equipment area network..., said plurality of local Web servers being individually *connected* to said isolation means."

Applicants respectfully submit that Birkle et al. fail to disclose an EAN as claimed in independent claim 1. The Examiner identifies element (10) of Fig. 3 to show "at least one *system* control." page 2 ¶ 0021 (emphasis added). Birkle et al. disclose that the "intelligent application components (3) are controlled by the system control (10)." page 2 ¶ 0021. Thus, the production system of Birkle et al. is designed such that system control (10) controls all of the intelligent application components and is not *dedicated* to controlling an individual one of them. Indeed, the at least one *system* control (10) is not a "plurality of *local* controllers" as claimed in claim 1. Moreover, even if there were multiple system controls (10), Birkle et al. fail to disclose "a plurality of local controllers each being *dedicated* and connected to an *individual* one of said plurality of pieces of equipment" as claimed in independent claim 1. (emphasis added). Moreover, Birkle et al. fail to disclose that the WEB servers are *dedicated* and connected to an individual system control (10). Indeed, Birkle et al. disclose multiple WEB servers which are all

connected to the system control (10). page ¶ 0021; *See* Fig. 3. Accordingly, Birkle et al. fail to disclose "a plurality of Web servers each being *dedicated* and connected to an *individual* one of said plurality of controllers" as claimed in independent claim 1. In addition, Birkle et al. merely disclose that the "[b]ridges and rooters, with which the entire data network (16) can be segmented into smaller deterministic data networks, may be integrated in the data network (16)" and that "the rooters control the data traffic while setting priorities and give priority to the time critical control data before other data." page 2 ¶ 0025. However, Birkle et al. fail to disclose that the bridges and rooters are individually connected to the WEB servers. Accordingly, Birkle et al. fail to disclose "said plurality of local Web servers being *individually* connected to said isolation means" as claimed in independent claim 1. Accordingly, Birkle et al. fail to disclose each and every element claimed in independent claim 1. Thus, Applicants respectfully request withdrawal of the rejections to independent claim 1.

Claims 2-15 depend either directly or indirectly from independent claim 1. Accordingly, dependent claims 2-15 are not anticipated by Birkle et al. for at least the reasons set forth above with respect to independent claim 1. Thus, Applicants respectfully request withdrawal of the rejections to dependent claims 2-15.

Birkle et al. also fail to disclose each and every element claimed in dependent claim 4. Birkle et al. disclose that the "[b]ridges and rooters, with which the entire data network (16) can be segmented into smaller deterministic data networks, may be integrated in the data network (16)" and that "the rooters control the data traffic while setting priorities and give priority to the time critical control data before other data." page 2 ¶ 0025. However, Birkle et al. fail to disclose that the bridges and rooters are individually connected to the WEB servers. Thus, Birkle et al. fail to disclose local isolation means including "a plurality of local router/switches each being connected to *individual* ones of said plurality of local Web servers" as claimed in dependent claim 4. In addition, claim 10 which depends from dependent claim 4 is similarly not anticipated by Birkle et al. Indeed, Birkle et al. fail to disclose Ethernet input/output modules connected to individual ones of the bridges and rooters. Accordingly, Birkle et al. fail to disclose "a plurality of Ethernet input/output modules connected to *individual* ones of said plurality of local router/switches" as claimed in dependent claim 10. Moreover, claims 11 and 13 which depend from dependent claim 4 are similarly not anticipated by Birkle et al. for at least the foregoing reasons.

In addition, for at least the reasons set forth above with respect to claim 1, Birkle et al. fail to disclose each and every element claimed in dependent claim 5. Moreover, Birkle et al. fail to disclose that the bridges and rooters are connected to more than one system control (10), to *individual* ones of the Web browsers *and* to a network other than data network (16). Accordingly, Birkle et al. fail to disclose "a plurality of local router/switches each being connected to all of individual ones of said plurality of local controllers..., to individual ones of said plurality of local browser means..., *and* to at least one of said *other* networks" as claimed in dependent claim 5. (emphasis added). In addition, claims 12 and 14 which depend from dependent claim 5 are similarly not anticipated by Birkle et al.

Regarding dependent claim 6, Birkle et al. fail to disclose that the WEB browsers are individually connected to the bridges and rooters. Accordingly, Birkle et al. fail to disclose that the "local browser means includes a plurality of Web browsers each being individually connected to said local isolation means" as claimed in dependent claim 6. In addition, claim 8 which depends from dependent claim 6 is similarly not anticipated by Birkle et al.

The Examiner asserts that Birkle et al., page 2 ¶ 0023 anticipates the invention as claimed in dependent claim 7. Birkle et al. disclose that "WEB browsers for displaying and operating the corresponding homepages (17) are installed on the display and operation devices (22)." page 2 ¶ 0023. For at least the reasons set forth above with respect to claims 1 and 2, Birkle et al. fail to disclose an EAN having local browser means including "a plurality of Web browsers, and said plurality of local router/switches are each connected to an *individual* one of said Web browsers" as claimed in dependent claim 7. In addition, claim 9 which depends from dependent claim 7 is similarly not anticipated by Birkle et al.

For the additional reasons set forth above with respect to dependent claims 4-14, Applicants respectfully submit that Birkle et al. fail to anticipate the invention as claimed in these claims. Accordingly, for these further reasons, Applicants respectfully request withdrawal of the rejections to dependent claims 4-14.

The Examiner asserts that Birkle et al., page 1 ¶¶ 0002, 0006, page 2 ¶¶ 0021-0022, 0025 and Fig. 3 element 10, disclose the invention as claimed in independent claim 16. Amended independent claim 16 claims "[a]n equipment area network (EAN) for a piece of equipment comprising: a controller dedicated and connected to said equipment; a local Web server connected to said controller; and isolation means connected to said Web server, for selectively

isolating said EAN from other networks outside of said equipment, wherein said EAN is dedicated to said equipment."

Applicants respectfully submit that Birkle et al. fail to disclose an EAN as claimed in amended independent claim 16. As discussed above with respect to independent claim 1, system control (10) is not *dedicated* to any one piece of equipment – system control (10) controls all of the intelligent application components. *See* page 2 ¶ 0021. Accordingly, Birkle et al. fail to disclose "a controller *dedicated* and connected to said equipment" as claimed in independent claim 16. Moreover, Birkle et al. disclose that "[b]ridges and rooters…may be integrated in the data network (16)." page 2 ¶ 0025. However, Birkle et al. fail to disclose "isolation means connected to said Web server, for selectively isolating said EAN from other networks *outside* of said equipment" as further claimed in amended independent claim 16. In addition, Birkle et al. simply fail to disclose an EAN, having a controller, a Web server and isolation means, that is *dedicated* to a piece of equipment as claimed in amended independent claim 16. Accordingly, Applicants respectfully submit that amended independent claim 16 is not anticipated by Birkle et al. and respectfully request withdrawal of the rejection to claim 16.

Claims 17-22 depend either directly or indirectly from amended independent claim 16, so for at least the reasons set forth above with respect to claim 16, claims 17-22 are similarly not anticipated by Birkle et al. Accordingly, Applicants respectfully request withdrawal of the rejection to dependent claims 17-22.

The Examiner asserts that Birkle et al., page 1 ¶ 6, page 3 ¶¶ 21-22, 25 and Fig. 3 element 10 disclose the invention as claimed in independent claim 23. Claim 23 has been amended to claim "[a] method for providing an equipment area network (EAN)…comprising the steps of: connecting a local controller to the piece of equipment wherein said local controller is dedicated to said equipment; connecting a local Web server to said controller; connecting a local router between said Web server and a computer network, for providing isolation therebetween while allowing selective communication therebetween; and assigning a unique network address to said router for devices outside the EAN, wherein said EAN is dedicated to said equipment."

Applicants respectfully submit that Birkle et al. fail to disclose each and every element claimed in independent claim 23. The Examiner identifies element (10) of Fig. 3 to show "at least one *system* control." page 2 ¶ 0021 (emphasis added). Birkle et al. disclose that the "intelligent application components (3) are controlled by the system control (10)." page 2 ¶

0021. Thus, *system* control (10) controls all of the application components (3) and is not a "*local* controller to the piece of equipment" as claimed in amended independent claim 23. Moreover, system control (10) is not *dedicated* to controlling any one intelligent application component. Accordingly, Birkle et al. fail to disclose "connecting a local controller to the piece of equipment wherein said local controller is dedicated to said equipment" as claimed in amended independent claim 23. Similarly, Birkle et al. disclose that "[b]ridges and rooters...may be integrated in the data network (16)." page 2 ¶ 0025. However, Birkle et al. fail to disclose "connecting a *local* router between said Web server and a computer network" as claimed in amended independent claim 23. (emphasis added). Moreover, Birkle et al. fail to disclose "wherein said EAN is dedicated to said equipment" as claimed in amended independent claim 23. Accordingly, Birkle et al. fails to anticipated the invention as claimed in amended independent claim 23, thus, Applicants respectfully request withdrawal of the rejection to claim 23.

Claims 24-27 depend either directly or indirectly from independent claim 23 and thus, are similarly not anticipated by Birkle et al. for at least the reasons set forth above with respect to independent claim 23. Accordingly, Applicants respectfully request withdrawal of the rejection to dependent claims 24-27.

Claims 28-29 and 31 were rejected under 35 U.S.C. § 103(a) as being obvious over Birkle et al. in view of U.S. Patent No. 7,058,973 ("Sultan"). The Examiner asserts that Birkle et al. fail to teach Network Address Translation as claimed in dependent claim 28. However, the Examiner asserts that it would have been obvious to one of ordinary skill in the art "to create the method of Birkle to include network address translation as taught by Sultan in order to pass information across the internet in a secure manner." The Examiner also asserts that Birkle et al. fails to teach ignoring requests as claimed in dependent claim 29. However, the Examiner asserts that it would have been obvious "to create the method of Birkle to include network address translation as taught by Sultan in order to pass information across the internet in a secure manner." The Examiner further asserts that Birkle et al. fails to teach ignoring requests as claimed in dependent claim 31. However, the Examiner asserts that it would have been obvious "to create the method of Birkle to include network address translation as taught by Sultan in order to pass information across the internet in a secure manner."

Applicants respectfully submit that even if Sutlan were combined with Birkle et al., the combination would not render claims 28-29 and 31 obvious. As discussed above with respect to

amended independent claim 23, Birkle et al. fail to teach each and every claimed in claim 23 from which claims 28-29 and 31 depend. Indeed, Birkle et al. fail to teach "connecting a *local* controller to the piece of equipment wherein said local controller is *dedicated* to said equipment...; connecting a *local* router between said Web server and a computer network" and "wherein said EAN is dedicated to said equipment" as claimed in amended independent claim 23 from which claims 28-29 and 31 depend. (emphasis added). Similarly, Sultan fails to supplement the teachings of Birkle et al. to teach these elements. Indeed, Sultan fails to teach "connecting a local controller to the piece of equipment wherein said local controller is dedicated to said equipment...; connecting a *local* router between said Web server and a computer network" and "wherein said EAN is dedicated to said equipment" as claimed in amended independent claim 23 from which claims 28-29 and 31 depend. Accordingly, even if Sultan were combined with Birkle et al., the combination would not achieve the invention as claimed in claims 28-29 and 31. Thus, Applicants respectfully submit that dependent claims 28-29 and 31 are not rendered obvious by Birkle et al. either alone or in combination with Sultan and respectfully request withdrawal of the rejection to dependent claims 28-29 and 31.

In addition, Applicants respectfully submit that, contrary to the Examiner's assertion, page 2 ¶¶ 0022-0023 fail to teach "configuring said router to receive requests from Web browsers both local and remote to said EAN" as claimed in independent claim 28. Indeed, the cited text fails to teach "a local router between the Web server and a computer network" as claimed in amended independent claim 23 from which claim 28 depends. Accordingly, for this further reason, dependent claim 28 is not rendered obvious by Birkle et al. either alone or in combination with Sultan.

Claims 30 and 32 were rejected under 35 U.S.C. § 103(a) as being obvious over Birkle et al. in view of Sultan and in further view of U.S. Patent No. 5,805,442 ("Crater et al."). The Examiner asserts that Birkle et al. fails to teach passwords as claimed in dependent claim 30. However, the Examiner asserts that it would have been obvious "to create the method of Birkle to include passwords as taught by Crater in order to approximately control client's access to data." The Examiner further asserts that Birkle et al. fails to teach passwords as claimed in dependent claim 32. However, the Examiner asserts that it would have been obvious "to create the method of Birkle to include passwords as taught by Crater in order to appropriately control client's access to data."

Applicants respectfully submit that dependent claims 30 and 32 are not rendered obvious by Birkle et al. either alone or in combination with Sultan or Crater et al. As discussed above with respect to dependent claims 28-29 and 31, Birkle et al. and Sultan fail to teach "connecting a *local* router between said [local] Web server and a computer network" and "wherein said EAN is dedicated to said equipment" as claimed in amended independent claim 23 from which claims 30 and 32 depend. (emphasis added). Crater et al. fail to supplement the teachings of Birkle et al. and Sultan and similarly fail to teach "connecting a local router between said [local] Web server and a computer network" and "wherein said EAN is dedicated to said equipment" as claimed in amended independent claim 23 from which claims 30 and 32 depend. Thus, assuming *arguendo,* even if Birkle et al. were combined with Sultan and Crater et al. the combination would not achieve the invention as claimed in dependent claims 30 and 32. Applicants respectfully submit that neither Birkle et al., Sultan nor Crater et al. teach or even suggest a method for providing an EAN as claimed in amended independent claim 23 from which claims 30 and 32 depend. Accordingly, Applicants respectfully request withdrawal of the rejections to dependent claims 30 and 32.

In view of the foregoing remarks, Applicants respectfully submit that claims 1-32 are neither anticipated nor rendered obvious by Birkle et al., Sultan or Crater et al., either alone or in combination. Accordingly, Applicants respectfully request withdrawal of the rejections to these claims and that the application be promptly passed to issue.

Respectfully Submitted,

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